IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

ANGELA ANESSA JAMERSON

Debtor : CASE NO. 1:17-bk-02721

:

NATIONSTAR MORTGAGE LLC
Movant

Jvant

:

ANGELA ANESSA JAMERSON

Respondent :

ANSWER TO MOTION FOR RELIEF FROM STAY

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. This paragraph paraphrases of a portion of a document, which is attached to as an exhibit to the Motion and which speaks for itself; to the extent that this paraphrase conflicts with the actual wording or meaning of the document, it is denied.
- 5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
- 6. Denied; the debtor does not believe that she is as far behind as alleged; the Movant does not appear to have included a payment (July 2017) that is included in the plan. The Debtor intends to cure any actual arrearages that are not paid trough her plan.
- 7. Denied, see response to paragraph 6.
- 8. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.
- 9. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.
- 10. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
Kara K. Gendron, Esquire
Attorney ID 87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
(717) 232–6650 TEL
(717) 232-0477 FAX
karagendron@gmail.com